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Attorney for Defendant Luciano Gabriel Rodriguez-Ortiz

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,) No. 3:23-mj-00190
)
Plaintiff,) DECLARATION
) OF RAYMOND
v.) TINDELL
)
LUCIANO GABRIEL RODRIGUEZ)
)
Defendant.)

I, Raymond Tindell, make the following Declaration:

I have been retained by defendant to represent him in this case. Substitution of Attorney was allowed yesterday, 11/27/2023. I have spoken to AUSA Paul Maloney and we are in discussions to potentially resolve this case prior

to Indictment. I have spoken to defendant and advised defendant of his rights to speedy Indictment pursuant to 18 USC Section 3161 and defendant agrees to waive speedy Indictment. It is in defendant's best interests to setover Arraignment at this time because no Indictment has been obtained nor filed in this case at this time. Defendant therefore agrees to Waive speedy Indictment to the new date requested pursuant to 18 USC Section 3161, to available dates of December 18, 19, 21, 22, 26-29, 2023.

My client may file a Waiver of Indictment prior to the next Arraignment date.

As I just got into this case I need more time to review the discovery and enter into effective negotiations. This is in defendant's best interest to setover the Arraignment at this time. I have spoken with AUSA Paul Maloney and he does not oppose this Motion.

I MAKE THIS DECLARATION WITH PERSONAL KNOWLEDGE OF THE FACTS AS STATED HEREIN, WITH THE UNDERSTANDING THAT THIS SHALL BE USED AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY OF PERJURY.

DATED this 28th day of November, 2023.

/s/Raymond Tindell

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